

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

JOANNA LANG, individually and as  
personal representative of the Estate Dick  
Lang, wife and husband and the marital  
community; and Joanna Lang, as guardian and  
parent of the minor children R.L. and C.L.,

Plaintiffs,

vs.

CHERYL STRANGE, individually and as  
Secretary of the Washington State Department  
of Social and Health Services (DSHS),

DAVID STILLMAN, individually and as  
Assistant Secretary of the Economic Services  
Administration (ESA) at DSHS,

DANA PHELPS, individually and as  
Assistant Secretary of the Services and  
Enterprise Support Administration (SESA) at  
DSHS,

TERRY REDMON, individually and as  
Interim Director of Vocational Rehabilitation  
at DSHS,

JANE AND JOHN DOES 1 THROUGH 10,  
individually and as employees at DSHS,

CLARK COUNTY, Washington,

No. 3:21-cv-05286

NOTICE OF REMOVAL

[Clerk's Action Required]

1 CITY OF VANCOUVER, Washington, a  
2 Municipality,

3 COWLITZ COUNTY, Washington,

4 CITY OF KELSO, Washington, a  
5 Municipality,

6 DAN HSIEH, individually and as Assistant  
7 Attorney General of Washington State,

8 EIMIKO MURLIN and JEFF IAN MURLIN,  
9 individually and as a marital community, as  
10 foster parents of C.L.,

11 and

12 STEVE VALLEMBOIS and JIMMY  
13 HOWARD, individually, as foster parents of  
R.L.,

Defendants.

14 TO: THE CLERK OF THE COURT  
15 UNITED STATES DISTRICT COURT  
16 WESTERN DISTRICT OF WASHINGTON AT TACOMA

17 Defendant CITY OF VANCOUVER, by its undersigned attorney, states:

18 1. The above captioned action against Defendants commenced on March 12, 2021,  
19 and is pending in the Superior Court of the State of Washington for Clark County, under Cause  
20 No. 21-2-00330-06. Defendant City of Vancouver obtained a copy of the summons and  
21 complaint on March 22, 2021, when a process server provided it to a legal assistant for the  
22 Vancouver City Attorney's Office. Copies of the Summons and Complaint are attached to this  
23 filing.

1           2. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is filed within thirty (30)  
2 days after Defendant City of Vancouver received a copy of the summons and complaint through  
3 service or otherwise.

4           3. Plaintiff, through the allegations in her complaint, alleges, *inter alia*, violations of  
5 her federal constitutional rights, 42 U.S.C. § 2000d, and 18 U.S.C. §§ 1961-1968. Plaintiff further  
6 alleges that Defendant City of Vancouver is liable under 42 U.S.C. § 1983. *See* Compl. ¶¶ 6, 58-  
7 64.

8           4. This Court has jurisdiction over the subject matter of this action pursuant to 28  
9 U.S.C. §§ 1331, 1343, and 1367(a).

10           5. The above-captioned action may be removed to this Court pursuant to 28 U.S.C.  
11 § 1441(b). This Court is a district court of the United States for the district and division  
12 embracing the place where the state court action is pending, and is therefore the appropriate Court  
13 for removal pursuant to 28 U.S.C. § 1441.

14           DATED on April 21, 2021.

15  
16           CITY ATTORNEY'S OFFICE  
            VANCOUVER, WASHINGTON

17           By:           /s/ Daniel G. Lloyd            
18                 Daniel G. Lloyd, WSBA No. 34221  
19                 Assistant City Attorney  
            Attorney for Defendant City of Vancouver  
            PO Box 1995  
            Vancouver, WA 98668-1995  
20                 **Tel:** 360.487.8500; **Fax:** 360.487.8501  
21                 [dan.lloyd@cityofvancouver.us](mailto:dan.lloyd@cityofvancouver.us)

**CERTIFICATE OF SERVICE**

I hereby certify that on the date provided below, I served via U.S. mail, first class, postage prepaid, a copy of the foregoing document and all referenced exhibits on counsel of record for all parties as listed below:

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DATED on April 21, 2021.

CITY ATTORNEY'S OFFICE  
VANCOUVER, WASHINGTON

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